

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS AUSTIN  
DIVISION**

In re:	§	Chapter 11
	§	
WC South Congress Square, LLC,	§	Case No. 20-11107-tmd
	§	
Debtor.	§	

**PROFFER OF SWORN TESTIMONY OF  
JEFFREY A. WORLEY, CPA**

I, Jeffrey A. Worley, CPA, hereby submit the following as a written proffer of my testimony in connection with the April 15, 2021 hearing on confirmation of the Second Amended Plan of Reorganization (the “**Plan**”) currently proposed in this case by WC South Congress Square, LLC (the “**Debtor**”). If called to the stand to testify, I would testify under oath as follows:

1. My name is Jeffrey A. Worley. I am over the age of 18 years and am competent and otherwise qualified to make this Declaration. I have personal knowledge of the matters stated herein, and they are all true and correct to the best of my knowledge.

2. I am a Certified Public Accountant who specializes in providing financial advisory services to financially distressed companies and companies in bankruptcy. I have more than twenty-five (25) years of experience in the restructuring industry.

3. The Court has approved the Debtor's engagement of Columbia Consulting Group, PLLC ("CCG") as the Debtor's financial advisor. I am CCG's managing member and its Partner-in-Charge for matters to be performed by CCG for or on behalf of the Debtor.

4. In my capacity as CCG's Partner-in-Charge for the financial advisory services CCG provides the Debtor, I have significant knowledge and familiarity with the Debtor's business operations and its finances, including complete access to the Debtor's electronic financial accounting system.

5. In the scope of my duties for the Debtor, I prepared the Financial Projections for the Debtor's proposed Second Amended Chapter 11 Plan of Reorganization and the *Debtor's Second Amended Disclosure Statement in Support of Second Amended Chapter 11 Plan of Reorganization*, filed March 10, 2021 in this chapter 11 bankruptcy case.

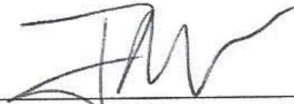
6. The Financial Projections reflect the Debtor is able to make all of its projected plan payments and make payment of all secured and unsecured creditors in full, on or before October 6, 2021.

7. I believe that the Financial Projections reflect that the Debtor is financially able to make the payments provided under the Plan and to satisfy ongoing expenses that it incurs in operating the Property through the Effective Date of the Plan.

*[Signature on Following Page]*

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 10, 2021

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Jeffrey A. Worley, CPA